

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

KENNETH BELL
Plaintiff,

VS.

WALMART, INC.
Defendant.

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CIVIL ACTION NO. 23-CV-542

JURY DEMANDED

INDEX OF DOCUMENTS FILED
WITH REMOVAL ACTION

- A. Plaintiff's Original Petition.
- B. Return of Service and Citation.
- C. Defendant's Original Answer to Plaintiff's Original Petition.
- D. Defendant's Demand for Jury Trial.
- E. Request for Service of Process.
- F. Request for Copy of Filed Stamped Petition.
- G. Register of Actions.
- H. List of Counsel of Record.

Exhibit A

CIT PPS SAC 3

2023CI03207

CAUSE NO. _____

KENNETH BELL
Plaintiff,

vs.

WALMART, INC.
Defendant.

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IN THE DISTRICT COURT

____ **JUDICIAL DISTRICT**

BEXAR COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, KENNETH BELL, hereinafter called ("Plaintiff"), complaining of and about WALMART, INC. hereinafter called ("Defendant"), and for cause of action shows unto the Court the following:

I. DISCOVERY CONTROL PLAN LEVEL

1.1 Pursuant to the provisions of Texas Rule of Civil Procedure 190.3, Plaintiff proposes to conduct discovery according to Discovery Control Plan Level III, and therefore requests this Court to enter a scheduling order.

II. PARTIES AND SERVICE

2.1 Plaintiff, KENNETH BELL, is an Individual whose address is 6435 Crestway Rd. Lot 100 San Antonio, Texas 78239.

2.2 Defendant, Walmart, Inc., a foreign corporation whose registered office is located in Arkansas at 702 SW 8th St. Dept. 8687 #0555 Bentonville, Arkansas 72716, may be served with process by serving its registered agent for service of process, CT Corporation System, in Dallas County at 1999 Bryan St., Ste. 900 Dallas, Texas 75201.

III. JURISDICTION AND VENUE

3.1 The subject matter in controversy is within the jurisdictional limits of this court.

3.2 Venue in Bexar County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

3.3 This court has jurisdiction over Defendant because Defendant purposefully availed itself of the privilege of conducting activities in the state of Texas and established minimum contacts sufficient to confer jurisdiction over Defendant, and the assumption of jurisdiction over Defendant will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process. Plaintiff would show that Defendant had continuous and systematic contacts with the state of Texas sufficient to establish general jurisdiction over Defendant. Plaintiff would also show that the cause of action arose from or relates to the contacts of Defendant to the state of Texas, thereby conferring specific jurisdiction with respect to Defendant.

IV. FACTS

4.1 On or about October 10, 2021, Plaintiff was present at Defendant's premises for the purpose of purchasing groceries. Plaintiff was in a grocery aisle of Defendant's premises when suddenly and without warning, an employee of Defendant shoved a cart into Plaintiff, striking Plaintiff's body. As a result of Defendant's negligence, Plaintiff sustained serious and permanent personal injuries.

V. NEGLIGENCE OF DEFENDANTS

5.1 Defendant had a duty to exercise the degree of care that a person of ordinary prudence would use to avoid harm to others under circumstances similar to those described herein. Plaintiff's injuries and damages were proximately caused by Defendant's negligent, careless, and reckless disregard of said duty.

5.2 The negligent, careless, and reckless disregard of said duty of Defendants consisted of, but is not limited to, the following acts and omissions:

- A. Negligently hired and/or retained employees;
- B. Negligently trained and/or supervised employees;
- C. Failing to properly train its agents, servants, and/or employees regarding the proper manner for moving shopping and/or stocking carts;
- D. Failing to properly train its agents, servants, and/or employees regarding the proper manner for moving shopping and/or stocking carts without coming into contact with business patrons;
- E. Failing to properly train its agents, servants, and/or employees regarding the proper manner for moving shopping carts and/or stocking carts without causing injuries to business patrons;
- F. Failing to hire competent employees;
- G. Failing to implement proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts;
- H. Failing to implement proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts without coming into contact with business patrons;
- I. Failing to implement proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts without causing injuries to business patrons;
- J. Failing to enforce proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts;

K. Failing to enforce proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts without coming into contact with business patrons;

L. Failing to enforce proper policies, rules, and/or procedures regarding the movement of shopping and/or stocking carts without causing injuries to business patrons;

5.3 At all times mentioned herein, all agents, servants, and/or employees of Defendant were acting within the course and scope of their employment or official duties and in furtherance of their duties of their employment. Under the theory of Respondeat Superior, Defendant is liable for the actions of their agents, servants and/or employees acting within the course and scope of their authority as agents, servants and/or employees of Defendant when the negligence occurred. Plaintiff alleges that upon the occasion in question, Defendant's employees failed to use ordinary care by various acts and omissions in at least one or more of the following ways:

- A. In shoving a row of shopping carts into Plaintiff's body;
- B. Failing to pay proper attention to the direction of the shopping and/or stocking cart;
- C. Failing to pay proper attention to business patrons around them.

VI. DAMAGES FOR PLAINTIFF

6.1 Pursuant to Texas Rule of Civil Procedure 47(c), Plaintiff seeks monetary relief in excess of \$1,000,000.00 including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney's fees and judgment for all other relief to which Plaintiff is entitled. Plaintiff expressly reserves the right to amend this Rule 47 statement of relief if necessary.

18. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, KENNETH BELL, was caused to suffer serious bodily injuries, and to incur the following damages:

- A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff, **KENNETH BELL**, for the necessary care and treatment of the injuries resulting from the accident and/or the aggravation of prior injuries and such charges are reasonable and were usual and customary charges for such services in Bexar County, Texas;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;
- F. Physical impairment in the future;
- G. Physical disfigurement in the past;
- H. Physical disfigurement in the future;
- I. Loss of earnings in the past;
- J. Loss of earning capacity which will, in all probability, be incurred in the future;
- K. Mental anguish in the future.
- L. Mental anguish in the past;
- M. Loss of Household Services in the past; and
- N. Loss of Household Services in the future;

VII. DEMAND FOR TRIAL BY JURY

7.1 Plaintiff demands a jury trial and tenders the appropriate fee with filing this petition.

VIII. RULE 193.7 NOTICE

8.1 Plaintiff hereby gives actual notice to Defendant that any and all documents produced may be used against Defendant at any pre-trial proceeding and/or at trial of this matter without the necessity of authenticating said documents.

IX. PRESERVATION OF EVIDENCE

9.1 Defendant is hereby given notice that any document or other material, including electronically stored information, that may be evidence or relevant to any issue, claim or defense in this case is to be preserved in its present form until this litigation is concluded. Failure to maintain such items will constitute "spoliation" of evidence, for which Plaintiff will seek appropriate sanctions and remedies.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendant for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

CESAR ORNELAS LAW, PLLC

By: Angela Tabares
Angela Tabares
SBN: 24096177
Cesar Ornelas
SBN: 24096139
11459 Huebner Rd.
San Antonio, Texas 78230

Phone: (210) 957- 2103

Fax: (888) 342-8033

Email: atabares@oinjurylaw.com

Email: cesar@oinjurylaw.com

ATTORNEYS FOR PLAINTIFF

Exhibit B

Gloria A. Martinez
Bexar County District Clerk
Accepted By: Wendy Rodriguez
Bexar County - 45th District Court

CAUSE NO. 2023CI03207

KENNETH BELL
PLAINTIFF

VS.

WALMART, INC.
DEFENDANT

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IN THE 45th District Court

BEXAR COUNTY, TX

RETURN OF SERVICE

ON Tuesday, March 28, 2023 AT 4:15 PM

CITATION, PLAINTIFF'S ORIGINAL PETITION for service on WALMART, INC. C/O REGISTERED AGENT CT CORPORATION SYSTEM came to hand.

ON Friday, March 31, 2023 AT 1:21 PM, I, DON ANDERSON, PERSONALLY DELIVERED THE ABOVE-NAMED DOCUMENTS TO: WALMART, INC. C/O REGISTERED AGENT CT CORPORATION SYSTEM, by delivering to Intake Specialist: George Martinez, 1999 BRYAN ST STE 900, DALLAS, DALLAS COUNTY, TX 75201.

My name is DON ANDERSON. My address is 1900 Brown, BALCH SPRINGS, TX 75180. I am a private process server certified by the Texas Judicial Branch Certification Commission (PSC 4232, expires 8/31/2024). My e-mail address is info@easy-serve.com. My date of birth is 7/14/1956. I am in all ways competent to make this statement, and this statement is based on personal knowledge. I am not a party to this case and have no interest in its outcome. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas COUNTY, TX on Monday, April 3, 2023.

/S/ DON ANDERSON

Kenneth Bell

Doc ID: 308634_1

Case Number: 2023CI03207

Kenneth Bell VS Walmart, Inc.
(Note: Attached Document May Contain Additional
Litigants)

IN THE 45TH DISTRICT COURT
BEXAR COUNTY, TEXAS

CITATION

"THE STATE OF TEXAS"

Directed To: **Walmart, Inc.**
By Serving Its Registered Agent: CT Corporation System

"You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00am on the Monday next following the expiration of twenty days after you were served this CITATION and PETITION a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org" Said Plaintiff's Original Petition was filed on this the 16th day of February, 2023. ISSUED UNDER MY HAND AND SEAL OF SAID COURT on this the 6th day of March, 2023.

ANGELA TABARES
ATTORNEY FOR PLAINTIFF
11459 Huebner RD
San Antonio TX 78230-1594



Gloria A. Martinez
Bexar County District Clerk
101 W. Nueva, Suite 217
San Antonio, Texas 78205
By: /s/ Mario Hernandez
Mario Hernandez, Deputy

KENNETH BELL VS WALMART, INC.

Case Number: 2023CI03207
45th District Court

Officer's Return

I received this CITATION on the _____ day of _____, 20____ at _____ o'clock ____ M. and () executed it by delivering a copy of the CITATION with attached PLAINTIFF'S ORIGINAL PETITION the date of delivery endorsed on it to the defendant _____ in person on the _____ day of _____, 20____ at _____ o'clock ____ M.

at _____ City _____ State _____ Zip _____

or () not executed because _____

Fees: _____ Badge/PPS #: _____ Date certification expires: _____

_____ County, Texas

BY: _____

OR: VERIFICATION OF RETURN (If not served by a peace officer) SWORN TO THIS _____

NOTARY PUBLIC, STATE OF TEXAS

OR: My name is _____, my date of birth is _____, and my address is _____ County.

I declare under penalty of perjury that the foregoing is true and correct. Executed in _____ County, State of Texas, on the _____ day of _____, A.D., _____.

Declarant

Exhibit C

FILED
 4/21/2023 4:20 PM
 Gloria A. Martinez
 Bexar County District Clerk
 Accepted By: Wendy Rodriguez
 Bexar County - 45th District Court

NO.: 2023CI03207

KENNETH BELL	§	IN THE DISTRICT COURT
	§	
VS.	§	45 TH JUDICIAL DISTRICT
	§	
WALMART, INC.	§	BEXAR COUNTY, TEXAS

DEFENDANT'S ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, WALMART INC., incorrectly named WALMART, INC., Defendant in the above numbered and entitled cause of action, and files this Original Answer to Plaintiff's Original Petition and for support thereof would respectfully show unto the Court as follows:

I.

Defendant asserts denials, under Rule 92 of the Texas Rules of Civil Procedure, to each and every allegation contained in the said Petition, and demands strict proof thereof.

II.

Pleading further and without waiving the foregoing, Defendant asserts that if Plaintiff suffered injuries as a result of the incident made the basis of this lawsuit, which Defendant expressly denies by the filing of this pleading, that said injuries were caused in whole or in part by Plaintiff's own negligence or responsibility. Accordingly, Defendant asserts all rights, privileges and remedies afforded or available pursuant to Chapter 33 of the Texas Civil Practices and Remedies Code.

III.

Pleading further and without waiving the foregoing, Defendant asserts that Plaintiff's recovery of medical or health care expenses, if any, is limited to the amount actually paid or incurred by or on behalf of Plaintiff. Accordingly, Defendant asserts all rights, privileges and

remedies afforded or available to it pursuant to §41.0105 of the Texas Civil Practices and Remedies Code.

IV.

Pleading further and without waiving the foregoing, Defendant would show that Plaintiff's alleged injuries and damages are the result of subsequent injuries or conditions which were a proximate cause, or producing cause, or the sole producing cause of Plaintiff's injuries and/or damages and not the result of any negligence on the part of this Defendant.

V.

Pleading further and without waiving the foregoing, Defendant specifically reserves the right to amend this Answer, as is its right under the Texas Rules of Civil Procedure.

PREMISES CONSIDERED, WALMART INC. prays that Plaintiff take nothing by this lawsuit, and that Defendant be allowed to go hence without day and recover all of their costs and attorneys' fees, and such other and further relief, both special and general, at law or in equity, to which they may show themselves justly entitled.

Respectfully submitted,

DAW & RAY, LLP

/s/ James K. Floyd

James K. Floyd; SBN:24047628

Email: jfloyd@dawray.com

Dilcia Z. Jones, SBN: 24115588

Email: djones@dawray.com

14100 San Pedro Ave., Suite 302

San Antonio, TX 78232

(210) 224-3121 Telephone

(210) 224-3188 Facsimile

**ATTORNEYS FOR DEFENDANT
WALMART INC.**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record in accordance with the TRCP on this the 21st day of April, 2023.

Angela Tabares
CESAR ORNELAS LAW, PLLC
11459 Huebner Rd.
San Antonio, Texas 78230

Email: atabares@oinjurylaw.com

/s/ James K. Floyd

James K. Floyd

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

JANICE DELGADO on behalf of James Floyd
 Bar No. 24047628
 jdelgado@dawray.com
 Envelope ID: 74913433
 Filing Code Description: ORIGINAL ANSWER OF
 Filing Description: WALMART INC.
 Status as of 4/24/2023 10:13 AM CST

Associated Case Party: Kenneth Bell

Name	BarNumber	Email	TimestampSubmitted	Status
Cesar Ornelas		cesar@oinjurylaw.com	4/21/2023 4:20:32 PM	SENT
Angela Tabares		atabares@oinjurylaw.com	4/21/2023 4:20:32 PM	SENT

Associated Case Party: Walmart, Inc.

Name	BarNumber	Email	TimestampSubmitted	Status
Lindsey Rish		Irish@dawray.com	4/21/2023 4:20:32 PM	SENT
Eileen Krueger		ekrueger@dawray.com	4/21/2023 4:20:32 PM	SENT
Dilcia Z.Jones		djones@dawray.com	4/21/2023 4:20:32 PM	SENT
James KFloyd		jfloyd@dawray.com	4/21/2023 4:20:32 PM	SENT

Exhibit D

NO.: 2023CI03207

KENNETH BELL	§	IN THE DISTRICT COURT
	§	
VS.	§	45 TH JUDICIAL DISTRICT
	§	
WALMART, INC.	§	BEXAR COUNTY, TEXAS

DEFENDANT'S DEMAND FOR JURY TRIAL

COMES NOW, WALMART INC., incorrectly named WALMART, INC., Defendant herein and, pursuant to the applicable Rules of the Texas Rules of Civil Procedure, hereby formally makes this demand and application for a jury trial in this litigation. Defendant will tender any appropriate jury fee upon the request of the court.

Respectfully submitted,

DAW & RAY, LLP

/s/ James K. Floyd

James K. Floyd; SBN:24047628

Email: jfloyd@dawray.com

Dilcia Z. Jones, SBN: 24115588

Email: djones@dawray.com

14100 San Pedro Ave., Suite 302

San Antonio, TX 78232

(210) 224-3121 Telephone

(210) 224-3188 Facsimile

ATTORNEYS FOR DEFENDANT

WALMART INC.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record in accordance with the TRCP on this the 21st day of April, 2023.

Angela Tabares
CESAR ORNELAS LAW, PLLC
11459 Huebner Rd.
San Antonio, Texas 78230

Email: atabares@oinjurylaw.com

/s/ James K. Floyd

James K. Floyd

Automated Certificate of eService

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JANICE DELGADO on behalf of James Floyd

Bar No. 24047628

jdelgado@dawray.com

Envelope ID: 74913433

Filing Code Description: ORIGINAL ANSWER OF

Filing Description: WALMART INC.

Status as of 4/24/2023 10:13 AM CST

Associated Case Party: Walmart, Inc.

Name	BarNumber	Email	TimestampSubmitted	Status
Lindsey Rish		Irish@dawray.com	4/21/2023 4:20:32 PM	SENT
Eileen Krueger		ekrueger@dawray.com	4/21/2023 4:20:32 PM	SENT
Dilcia Z. Jones		djones@dawray.com	4/21/2023 4:20:32 PM	SENT
James KFloyd		jfloyd@dawray.com	4/21/2023 4:20:32 PM	SENT

Associated Case Party: Kenneth Bell

Name	BarNumber	Email	TimestampSubmitted	Status
Cesar Ornelas		cesar@oinjurylaw.com	4/21/2023 4:20:32 PM	SENT
Angela Tabares		atabares@oinjurylaw.com	4/21/2023 4:20:32 PM	SENT

Exhibit E



20230103201
Cause Number: _____

District Court : _____

GLORIA A. MARTINEZ
Bexar County District Clerk CIT PPS SAC 3

REQUEST FOR PROCESS

Style: Kenneth Bell Vs. Walmart, Inc.

Request the following process: (Please check all that Apply)

☒ Citation ☐ Notice ☐ Temporary Restraining Order ☐ Notice of Application for Protective Order
☐ Temporary Protective Order ☐ Precept with hearing ☐ Precept without a hearing ☐ Writ of Attachment
☐ Writ of Habeas Corpus ☐ Writ of Garnishment ☐ Writ of Sequestration ☐ Capias ☐ Other: _____

1.

Name: Walmart, Inc.

Registered Agent/By Serving: CT Corporation System

Address 1999 Bryan St., Ste. 900 Dallas, Texas 75201

Service Type: (Check One) ☒ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

2.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

3.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

4.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

Title of Document/Pleading to be Attached to Process: Plaintiff's Original Petition

Name of Attorney/Pro se: Angela Tabares Bar Number: 24096177

Address: 11459 Huebner Rd. Phone Number: 210-957-2103
San Antonio, Texas 78230

Attorney for Plaintiff ☒ Defendant ☐ Other ☐

****IF SERVICE IS NOT PICKED UP WITHIN 14 BUSINESS DAYS, SERVICE WILL BE DESTROYED****

Exhibit F



March 28, 2023

Bexar County District Clerk

Paul Elizondo Tower
101 W Nueva, Suite #217
San Antonio, Texas 78205-3411

Re: Cause No. 2023CI03207; *Kenneth Bell v. Walmart Inc.*; In the 45th Judicial
District Court, Bexar County, Texas.

REQUEST FOR COPY OF FILED STAMPED PETITION

Dear Bexar County District Clerk,

This letter is to request copy of the filed stamped petition for this case. Please email copy to khamby@oinjurylaw.com

Should you have any questions or need any additional information, please do not hesitate to contact our office. Thank you for your attention with this matter.

Sincerely,
CESAR ORNELAS LAW PLLC

/s/ Angela Tabares
Attorney and Counselor at Law

AT/kjh

Exhibit G

45th District Court

Case Summary

Case No. 2023CI03207

Kenneth Bell VS Walmart, Inc. ET AL

§ Location

§ **45th District Court**

§ Judicial Officer

§ **45th, District Court**

§ Filed on

§ **02/16/2023**

Case Information

Case Type: OTHER INJURY OR
DAMAGE

Case Status: **02/16/2023 Pending**

Assignment Information

Current Case Assignment

Case Number 2023CI03207

Court 45th District Court

Date Assigned 02/16/2023

Judicial Officer 45th, District Court

Party Information

Lead Attorneys

Plaintiff **Bell, Kenneth** **TABARES, ANGELA**
Retained

Defendant **WALMART INC.** **FLOYD, JAMES**
Retained

Walmart, Inc.

Events and Orders of the Court

02/16/2023 New Cases Filed (OCA)

02/16/2023 PETITION

02/16/2023 REQUEST FOR SERVICE AND PROCESS

03/06/2023 **Citation**
Walmart, Inc.
Served: 03/31/2023

03/28/2023 LETTER TO DISTRICT CLERK
Requesting Copies-emailed 3/31/23

04/03/2023 RETURN OF SERVICE - SUCCESSFUL
OF WALMART, INC.

04/21/2023 ORIGINAL ANSWER OF
WALMART INC.

04/21/2023 JURY DEMAND JURY FEE NOT PAID

Exhibit H

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

KENNETH BELL
Plaintiff,

VS.

WALMART, INC.
Defendant.

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CIVIL ACTION NO. 23-CV-542

JURY DEMANDED

LIST OF COUNSEL OF RECORD

1. Angela Tabares; SBN: 24096177
Email: atabares@oinjurylaw.com
Cesar Ornelas; SBN: 24096139
Email: cesar@oinjurylaw.com
CESAR ORNELAS LAW, PLLC
11459 Huebner Rd.
San Antonio, Texas 78230
(210) 957-2103 Telephone
(888) 342-8033 Telecopier
**ATTORNEYS FOR PLAINTIFF,
KENNETH BELL**
2. James K. Floyd; SBN: 24047628
Email: jfloyd@dawray.com
Dilcia Z. Jones, SBN: 24115588
Email: djones@dawray.com
DAW & RAY, LLP
14100 San Pedro, Suite 302
San Antonio, Texas 78232
(210) 224-3121 Telephone
(210) 224-3188 Facsimile
**ATTORNEYS FOR DEFENDANT,
WALMART INC.**